

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT SOUTH CAROLINA  
COLUMBIA DIVISION**

DISABILITY RIGHTS SOUTH  
CAROLINA, ABLE SOUTH  
CAROLINA, AMANDA McDOUGALD  
SCOTT, individually and on behalf of  
P.S., a minor; MICHELLE FINNEY,  
individually and on behalf of M.F., a  
minor; LYUDMYLA TSYKALOVA,  
individually and on behalf of M.A., a  
minor; EMILY POETZ, individually and  
on behalf of L.P., a minor; SAMANTHA  
BOEVERS, individually and behalf of  
P.B., a minor; TIMICIA GRANT,  
individually and on behalf of E.G., a  
minor; CHRISTINE COPELAND,  
individually and on behalf of L.C., a  
minor; HEATHER PRICE, individually  
and on behalf of H.P., a minor; and  
CATHY LITTLETON, individually and  
on behalf of Q.L., a minor,

*Plaintiffs,*

v.

HENRY McMASTER, in his official  
capacity as Governor of South Carolina;  
ALAN WILSON, in his official capacity as  
Attorney General of South Carolina;  
MOLLY SPEARMAN, in her official  
capacity as State Superintendent of  
Education; GREENVILLE COUNTY  
SCHOOL BOARD; HORRY COUNTY  
SCHOOL BOARD; LEXINGTON  
COUNTY SCHOOL BOARD ONE;  
OCONEE COUNTY SCHOOL BOARD;  
DORCHESTER COUNTY SCHOOL  
BOARD TWO; CHARLESON COUNTY  
SCHOOL BOARD; and PICKENS  
COUNTY SCHOOL BOARD,

*Defendants.*

Case No. 3:21-cv-02728-MGL

**PLAINTIFFS' MOTION TO AMEND  
CASE CAPTION TO CORRECT  
SPELLING OF INDIVIDUAL  
PLAINTIFF "TAMICA GRANT" TO  
"TIMICIA GRANT"**

Plaintiffs Disability Rights South Carolina, Able South Carolina, Amanda McDougald Scott, individually and on behalf of P.S., a minor; Michelle Finney, individually and on behalf of M.F., a minor; Lyudmyla Tsykalova, individually and on behalf of M.A., a minor; Emily Poetz, individually and on behalf of L.P., a minor; Samantha Boevers, individually and behalf of P.B., a minor; Timicia Grant, individually and on behalf of E.G., a minor; Christine Copeland, individually and on behalf of L.C., a minor; Heather Price, individually and on behalf of H.P., a minor; and Cathy Littleton, individually and on behalf of Q.L., a minor (collectively, “Plaintiffs”) hereby move this Court, pursuant to Rule 15(a)(2), Fed. R. Civ. P., for leave to amend the case caption to correct the spelling of Plaintiff Timicia Grant, who was improperly identified as Tamica Grant in the Complaint filed on August 24, 2021, at ECF No. 1. References to Tamica Grant are in the case caption and Paragraph Nos. 15 and 75 of the Complaint. Plaintiffs request that the correction apply to all references to Ms. Grant.

Respectfully submitted,

**WYCHE, P.A.**

s/Rita Bolt Barker

Rita Bolt Barker

Federal Bar No. 10566

200 East Camperdown Way

Greenville, SC 29601

T: (864) 242-8235 | Fax: (864) 235-8900

E: [rbarker@wyche.com](mailto:rbarker@wyche.com)

**AMERICAN CIVIL LIBERTIES UNION OF SOUTH CAROLINA**

Allen Chaney

Federal Bar No. 13181

P.O. Box 20998

Charleston, SC 29413

T: (843) 282-7953

E: [achaney@aclusc.org](mailto:achaney@aclusc.org)

**SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER**

Adam Protheroe  
Federal Bar No. 11033  
P.O. Box 7187  
Columbia, SC 29202  
T: (803) 816-0607 | Fax: (803) 779-5951  
[adam@scjustice.org](mailto:adam@scjustice.org)

**DISABILITY RIGHTS SOUTH CAROLINA**

B. Randall Dong (Fed. Ct. ID 5989)  
Anna Maria Conner (Fed. Ct. ID 5532)  
Amanda C. Hess (Fed. Ct. ID 10303)  
3710 Landmark Dr., Suite 208  
Columbia, SC 29204  
T: (803) 782-0639  
[dong@disabilityrightssc.org](mailto:dong@disabilityrightssc.org)  
[conner@disabilityrightssc.org](mailto:conner@disabilityrightssc.org)  
[hess@disabilityrightssc.org](mailto:hess@disabilityrightssc.org)

**AMERICAN CIVIL LIBERTIES UNION FOUNDATION**

Louise Melling\*  
125 Broad St.  
New York, NY 10004  
T: (212) 549-2637  
E: [lmelling@aclu.org](mailto:lmelling@aclu.org)

Susan Mizner\*  
39 Drumm Street  
San Francisco, CA 94111  
T: (415) 343-0781  
E: [smizner@aclu.org](mailto:smizner@aclu.org)

**ARNOLD & PORTER KAYE SCHOLER LLP**

John A. Freedman\*  
601 Massachusetts Ave, NW  
Washington, DC 20001  
T: 202.942.5316  
E: [john.freedman@arnoldporter.com](mailto:john.freedman@arnoldporter.com)

\*Motion to proceed *pro hac vice* forthcoming

***Attorneys for the Plaintiffs***

Date: August 25, 2021  
Greenville, South Carolina